

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Edward Franklin Dabney
Angelea Michelle Dabney
Debtor(s)**

CHAPTER13

**FREEDOM MORTGAGE CORPORATION
Movant**

vs.

NO. 20-00555 HWV

**Edward Franklin Dabney
Angelea Michelle Dabney
Debtor(s)**

Jack N. Zaharopoulos **11 U.S.C. Section 362**
Trustee

**DEBTORS' ANSWER TO MOTION OF FREEDOM
MORTGAGE CORPORATION FOR RELIEF FROM
THE AUTOMATIC STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. There were no arrears at the time the bankruptcy was filed.
6. Admitted in part; Denied in part. Debtors have failed to make some mortgage payments post-petition.
7. Denied in that Debtors are without personal knowledge as to the exact amount of arrears.
8. Denied. Debtors can cure the arrears through an amended plan.

9. No response required.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion for Relief from Stay.

Respectfully submitted,

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